

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**PLAINTIFF’S ASSENTED-TO MOTION FOR LEAVE TO FILE A REPLY  
MEMORANDUM IN SUPPORT OF ITS MOTION TO QUASH SUBPOENAS AND  
DEPOSITION NOTICES OR FOR A PROTECTIVE ORDER**

Pursuant to Local Rule 7.1(b)(3), Plaintiff, Students for Fair Admissions, Inc. (“SFFA”), respectfully moves for leave to submit a reply memorandum in support of SFFA’s Motion to Quash Subpoenas and Deposition Notices or for a Protective Order (the “Motion”).<sup>1</sup> The Motion seeks to quash the depositions of two of SFFA’s standing members. A reply memorandum for the Motion is warranted to address certain assertions and arguments in Defendant’s opposition which require a response. Pursuant to Local Rule 7.1(a)(2), Defendant was made aware of this motion and assents to it. If this motion is granted, SFFA shall submit its reply memorandum by April 5, 2017.

WHEREFORE, SFFA respectfully requests that the Court grant its motion for leave to file a reply memorandum in support of the Motion.

---

<sup>1</sup> The Motion (including SFFA’s accompanying memorandum) was filed under seal on March 15, 2017, per court order (Dkt. 254). Harvard’s opposition to the Motion was also filed under seal on March 29, 2017, per court order (Dkt. 264).

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

Paul M. Sanford BBO #566318  
Benjamin C. Caldwell BBO #675061  
BURNS & LEVINSON LLP  
One Citizens Plaza, Suite 1100  
Providence, RI 02903  
Tel: 617-345-3000  
Fax: 617-345-3299  
psanford@burnslev.com  
bcaldwell@burnslev.com

William S. Consovoy  
Thomas R. McCarthy  
Michael H. Park  
J. Michael Connolly  
CONSOVOY MCCARTHY PARK PLLC  
3033 Wilson Boulevard, Suite 700  
Arlington, Virginia 22201  
Tel: 703-243-4923  
Fax: 703.243.4923  
will@consovoymccarthy.com  
tom@consovoymccarthy.com  
park@consovoymccarthy.com  
mike@consovoymccarthy.com

Dated: March 31, 2017

Patrick Strawbridge BBO #678274  
CONSOVOY MCCARTHY PARK PLLC  
Ten Post Office Square  
8th Floor South PMB #706  
Boston, MA 02109  
Tel: 617-227-0548  
patrick@consovoymccarthy.com

*Counsel for Plaintiff Students for Fair  
Admissions, Inc.*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(a)(2), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Benjamin C. Caldwell

4831-3265-1334.1